



December 6, 2012

**VIA ELECTRONIC COMMENT FILING SYSTEM (ECFS)**

Ms. Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12th Street SW  
Washington, D.C. 20554

**Re: Implementing a Nationwide, Broadband Interoperable Public Safety Network in the 700 MHz Band, PS Docket No. 06-229; Facilitating the Deployment of Text-to-911 and Other Next Generation 911 Applications, PS Docket No. 11-153; Framework for Next Generation 911 Deployment, PS Docket No. 10-255**

Dear Ms. Dortch:

On December 4, 2012, NATOA Immediate President Ken Fellman, President-Elect Tony Perez, NATOA Board Members Jodie Miller, Mike Lynch, Catharine Rice, and, via phone, Barry Fraser and Jeff Lueders, and the undersigned, met with Public Safety & Homeland Security Bureau Chief David Turetsky and PSHS representatives Jeffery Goldthorp, Zenji Nakazawa, Timothy Peterson, David Furth, and, via phone Erika Olsen, to discuss issues of importance to local governments and their constituents. Among the issues we discussed were the deployment of next generation 911 services and the deployment of the nationwide public safety wireless broadband network.

During the meeting, we discussed how the aftermath of Superstorm Sandy and the June 2012 derecho would affect the development of the nationwide interoperable public safety wireless broadband network, especially as to backup power. We also discussed how AT&T's petition to abandon its copper lines would play into the conversation, noting that no one technology held all the answers.

We also discussed the Commission's anticipated December order concerning 911 texting and how NATOA could participate in public education efforts to inform consumers about their ability – or lack thereof – to text 911 in cases of emergency. We also talked of how text 911 services could not supplant the effectiveness of voice 911 communications.



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Next generation 911 services were also discussed, along with the challenges that local governments would face from a financial aspect. Comments dealing with the legal framework of NG 911 are due December 13.

Pursuant to Commission rules, please include a copy of this notice in the record for the proceedings noted above.

Sincerely,  
*/s/ Steve Traylor*  
Executive Director  
NATOa

Cc: PSHS Bureau Chief David Turetsky  
Erika Olsen  
Jeffery Goldthorp  
Zenji Nakazawa  
Timothy Peterson  
David Furth



NATIONAL ASSOCIATION OF TELECOMMUNICATIONS OFFICERS AND ADVISORS  
NATIONAL ASSOCIATION OF COUNTIES  
NEW AMERICA FOUNDATION'S OPEN TECHNOLOGY INITIATIVE

September 14, 2010

The Honorable Mignon Clyburn  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Dear Commissioner Clyburn,

The National Association of Telecommunications Officers and Advisors, the National Association of Counties, and the New America Foundation's Open Technology Initiative join together in support of the Federal Communications Commission's proposal to allow E-Rate funding to be used to lease dark fiber from any source, including municipalities. We believe that this proposal would be in the public interest and would aid schools and libraries in obtaining the most economically efficient access to broadband that would presumably be prioritized under the revised E-Rate program.

Some have argued that local municipalities may lack the experience necessary to provide the best service option or that "certain non-carriers" would receive a cost advantage over traditional telecommunications carriers. However, the efficiency of allowing E-Rate funds to be used for the leasing of dark fiber from any source – and specifically, municipalities – was highlighted in comments filed with the Commission by the City and County of San Francisco.<sup>1</sup>

In their comments, San Francisco highlighted the concerns of the San Francisco Public Library System which has to rely on commercial carriers to receive service if they want to take advantage of the E-Rate discount. Although this service is adequate for today's needs, it is doubtful it will be adequate for future needs. And even if higher bandwidth is available from the carrier, the library system has determined that the price (even with the E-Rate discount) is prohibitive. On the other hand, San Francisco operates a middle mile broadband network that could provide the needed bandwidth for the library system through dark fiber leasing. However, without the E-Rate discount, the cost to San Francisco is not conducive to such a plan.

As this case points out, the greatest efficiency may be from leasing dark fiber that is owned by a non-telecommunications entity, such as a local government anchor institution network. But every case will have specific facts and circumstances. Whether the source is dark fiber from a telecommunications carrier, lit fiber from a local anchor institution networks, or some other option, the Commission should increase the options available to schools and libraries to the greatest extent possible. The point of the E-Rate program is to assist schools and libraries obtain the services they need to help the residents they serve – we should be seeking to give them as many options as we can.

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<sup>1</sup> *Comments of the City and County of San Francisco*, CC Docket 02-6, GN Docket 09-51, FCC 10-83, filed Jul. 9, 2010.



September 15, 2010

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In conclusion, the Commission should move forward with its proposal to make the leasing of dark fiber from **any** source eligible for E-Rate funding. In addition, the Commission should go further and make the leasing of lit fiber from local anchor institution networks eligible for E-Rate funding, as well. The best way to maximize the benefits of the E-Rate program and provide the most efficient use of funds is to provide schools and libraries with as many options as possible so that they can choose the broadband source that will best suit their needs and budgets.

Sincerely,

National Association of Telecommunications Officers and Advisors: Steve Traylor, 703-519-8035

National Association of Counties: Jeff Arnold, 202-393-6226

New America Foundation's Open Technology Initiative, Sascha Meinrath, 202-986-2700